

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GLORY N. NNA, ADMINISTRATRIX OF
THE ESTATE OF HILLARY OBIOMA
NNA, MICHAEL P. MASON, JORY S.
MASON, AND PETER W. LEE,

Plaintiffs,

v.

WABTEC CORPORATION F/K/A
WESTINGHOUSE AIR BRAKE
COMPANY AND BOMBARDIER
TRANSIT CORPORATION,

Defendants.

CIVIL ACTION NO. 06-11950-DPW

DISCLOSURE OF MEDICAL INFORMATION

Pursuant to Local Rule 35.1, the plaintiffs disclose the following medical records and bills pertaining to the diagnosis, care and treatment of injuries relating to the subject accident:

Obioma Hillary Nna

Mr. Nna (date of birth 10/21/58) was struck by a train and killed instantly and his body mutilated by the impact. He left surviving his wife, Glory N. Nna, and five minor children: Chika (date of birth 07/09/92); Ogechi (date of birth 10/09/94); Uchechi (date of birth 06/06/96); Chigozie (date of birth 03/15/99); and Chidi (date of birth 01/04/01).

A copy of the Death Certificate of Hillary Obioma Nna and a copy of his funeral bill in the amount of \$4,555.00 is being sent to counsel for the defendants with this Disclosure.

Michael P. Mason

Mr. Mason (date of birth 05/18/51) was also struck by the train and sustained multiple injuries, including a cardiac contusion with atrial fibrillation, right rib 1 fracture, left rib 1 to 6 fractures, cervical spine fracture, left humeral fracture, and post-traumatic stress syndrome.

A copy of the following records and bills are being sent to counsel for the defendants with this Disclosure:

Medical Records

Massachusetts General Hospital, Patient Extract 01/27/05 - 11/08/05
Jordan Health and Wellness Center, 05/31/01 - 10/04/06
Brockton Visiting Nurse Assoc., 02/02/05 - 04/29/05

Medical Bills

Mass. General Physicians Org., Inc. in the amount of \$750.00
Brockton Visiting Nurse Assoc. in the amount of \$8,093.34

In addition, medical records and/or bills have been requested from the following providers and have not yet been received:

Massachusetts General Hospital
Jordan Health and Wellness Center

Mr. Mason is continuing to receive medical treatment, and the plaintiffs will timely supplement medical records and bills as they are received.

Peter W. Lee

Mr. Lee (date of birth 02/18/58) was also struck by the train and sustained multiple injuries, including injuries to his head, neck, right shoulder, right elbow, and chest. He has suffered from headaches, depression and anxiety. He was diagnosed as having post traumatic stress syndrome and post-concussive syndrome.

A copy of the following records and bills are being sent to counsel for the defendants with this Disclosure:

Medical Records

Beth Israel Deaconess Hospital, 01/27/05 - 01/29/05
John F. Mahoney, M.D., 02/07/05, 02/28/05, 03/31/05, 04/26/05, 05/11/05,
06/03/05, 06/30/05
CT Chest Scan, 04/05/05
Marie M. Walbridge, Ph.D. report of 07/05/05
Sheryl Thau, Psy.D. note of 09/12/05
Paul M. Smiley, M.D. IME of 05/04/05
Michael Rater, M.D. IME of 08/05/05
Mass Bay Regional MRI, 02/10/05
Caritas Carney Hospital - Rehab Services, Outpatient Dept., 03/10/05 - 07/07/05
Caritas Carney Hospital, CT Scan, 04/05/05

Medical Bills

Marie M. Walbridge in the amount of \$1,430.00
Massachusetts Bay Regional MRI, LP in the amount of \$3,600.00

In addition, medical records and/or bills have been requested from the following providers and have not yet been received:

Beth Israel Deaconess Hospital
John F. Mahoney, M.D.
Sheryl Thau, Psy.D.
Caritas Carney Hospital - Rehab. Services, Outpatient Department

Mr. Lee is continuing to receive medical treatment and the plaintiff will timely supplement medical records and bills as they are received.

By their attorneys,

SUGARMAN AND SUGARMAN, P.C.

Dated:

/s/ G. Thomas Pauling

Neil Sugarman - BBO #484340

G. Thomas Pauling - BBO #567692

One Beacon Street

Boston, Massachusetts 02108

617-542-1000

Certificate of Service

I, G. Thomas Pauling, of the firm Sugarman and Sugarman, P.C., hereby certify that I have served the within document on all parties of interest through the ECF system and will be sent electronically to the registered participants as identified on the NEF on November 16, 2006. Also, copies of the within described medical records and bills are being sent via regular mail to:

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Date: 11/16/06

/s/ G. Thomas Pauling

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